



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 28, 2022

BY ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: ***United States v. Lawrence Ray,***
S2 20 Cr. 110 (LJL)

Dear Judge Liman:

The Government admitted Government Exhibit 2201, which included automated text messages from Zelle about money transfers to Felicia Rosario from Santos Rosario. The Government will also seek to admit Government Exhibits GX 1615 through GX 1626, which are receipts of purchases and deposits found in the defendant's residence. With respect to both categories of exhibits, the Government seeks to offer them for the truth of the matter asserted. *See United States v. Tin Yat Chin*, 371 F.3d 31, 38 (2d Cir. 2004) (collecting Second Circuit authority where receipts "were admitted as non-hearsay to prove a fact *against* the defendant" and explaining that "when a category of writings does not trigger the traditional reliability concerns of hearsay-defects in memory, perception, narration, or sincerity, we have sanctioned their admissibility as non-hearsay").

Respectfully submitted,

DAMIAN WILLIAMS
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cc: Defense Counsel (by ECF)